

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

MARTHA VASSALLE,

and

JEROME JOHNSON

Plaintiffs,

-vs-

Case No. 3:11-cv-00096

Honorable David M. Katz

And Related Cases:

Case No. 3:08-cv-01434

Case No. 3:10-cv-00091

MIDLAND FUNDING, LLC,

and

MIDLAND CREDIT MANAGEMENT, INC.,

and

ENCORE CAPITAL GROUP, INC.

Defendants.

MOTION TO ADMIT RICHARD L. STONE *PRO HAC VICE*

Theodore W. Seitz, counsel of record for Defendants Midland Funding, LLC, Midland Credit Management, Inc., and Encore Capital Group, Inc., respectfully moves this Court for admission *pro hac vice* of Richard L. Stone.

Richard L. Stone was admitted to the California State Bar in 1983 and remains in good standing (Affidavit attached as Exhibit A). His California bar number is 110022. Mr. Stone is an attorney with Hogan Lovells US LLP, 1999 Avenue of the Stars, Suite 1400, Los Angeles, CA 90067, (310) 785-4600 (telephone), (310) 785-4668 (direct), (310) 785-4601 (facsimile); richard.stone@hoganlovells.com (e-mail).

WHEREFORE, the undersigned respectfully requests that this Court admit Richard L. Stone *pro hac vice* for the purposes of representing Defendants Midland Funding, LLC, Midland Credit Management, Inc., and Encore Capital Group, Inc. in the above-captioned lawsuit.

Date: July 1, 2011

Respectfully Submitted:

/s/Theodore W. Seitz
Theodore W. Seitz
Dykema Gossett PLLC
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Credit Management, Inc., and Encore Capital
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Certification

This is to certify that this document has been electronically filed with the Court on July 1, 2011. Notice of filing will be sent to the parties by operation of the Court's electronic filing system. The parties may access this filing through the Court's system.

/s/Theodore W. Seitz
Theodore W. Seitz
Dykema Gossett PLLC
Counsel for Midland Funding, LLC, Midland
Credit Management, Inc., and Encore Capital
Group